AVAYA

Commission's Secretary
Office of the Secretary
Federal Communications Commission
236 Massachusetts Avenue, NE
Suite 110
Washington, DC 20002

August 13, 2008

RE: Comments on Draft Eligible services list for Schools and Libraries
       Universal Service Mechanism   CC Docket No. 02 -6

Thank you so much for the opportunity to comment on the Eligible Services List for Schools and Libraries.   We strongly believe that the addition of software user licenses for Interconnected Voice over Internet Protocol (VoIP) systems is warranted.

Avaya Intelligent Communications solutions are helping schools throughout the world to change the experience of their students for the better—addressing current needs, but also enabling educational institutions to keep adapting and growing as technology and student/faculty needs change. Avaya solutions are designed to ensure that the gains in productivity afforded by intelligent communications are not lost by requiring an additional investment in infrastructure or extra administration and maintenance.

Schools and campuses are hubs of activity where many functions take place everyday. Communications are critical to keeping classes, meetings, administration, libraries, sports, entertainment, food service, and more operating.

Schools can further realize numerous benefits from the use of Voice over Internet Protocol (VoIP) systems with the addition of software user licenses for Interconnected Voice. Some of which are:

• Enhance and extend the learning experience
• Respond more effectively to the everyday needs of students
• Simplify routine administration tasks
• Lower the costs of system administration and maintenance
• Create flexible failover options that speed recovery and are easy to set up and administer.
• Leverage IP-based communications for flexible, cost-effective alternatives to costly, redundant back-up facilities.

• Support total communications continuity across multi-vendor technologies including TDM-and IP-based infrastructures and applications.
• Reduce the likelihood of an outage or disruption.
• Maximize student, faculty and staff safety

Avaya solutions also minimize the number of servers needed in your network— that means fewer servers to equip with software, upgrade, boot and reboot, etc. Avaya system management tools give you the ability to administer both IP and circuit switched systems simultaneously, potentially delivering huge savings in day to day administration and requiring less staff and as enrollment continues to rise, your infrastructure will be scalable.

We appreciate you consideration and support of further enabling schools to take advantage of technological advances that improve the lives, learning experience, and safety of student, teachers, and faculty.

Sincerely,

Lisa S. Williamson

Lisa S. Williamson
North American Sales Leader
State, Local, and Education Markets
lwilliamson@avaya.com
615.377.2650